

CRIMINAL COMPLAINT

STATE OF WISCONSIN

DA Case No.: 2012ML005628

Plaintiff,

vs.

Complaining Witness:

Lipski, Gerald John  
102 Clyman Street #12  
Watertown, WI 53094  
DOB: 05/08/1945

Court Case No.:

Defendant,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION  
AND BELIEF STATES THAT:

**Count 1: SOLICITATION OF FIRST DEGREE INTENTIONAL HOMICIDE, DOMESTIC  
ABUSE**

The above-named defendant on or about Monday, March 05, 2012, at 8885 South 68th Street, in the City of Franklin, Milwaukee County, Wisconsin, advised another to cause the death of [REDACTED] another human being, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.30, 968.075(1)(a) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

I am a Milwaukee County Sheriff's Deputy and base this complaint upon the police reports generated by Detective [REDACTED] of the Milwaukee County Sheriff's Office. Complainant has relied upon these reports before and found them to be truthful and accurate and knows that they are created in the normal course of police business. These reports indicate the following:

On March 2, 2012 Detective [REDACTED] was assigned to investigate a solicitation to commit first-degree intentional homicide at the County Correctional South Facility located at the above address. Detective [REDACTED] received information from the staff there that an inmate, Gerald Lipski, the defendant, wanted his ex-girlfriend [REDACTED] and her adopted grandson, [REDACTED] killed. Detective [REDACTED] was passed through the staff from another inmate [REDACTED]. Detective [REDACTED] strongly indicated in his reports that the defendant is currently charged with multiple cases that list [REDACTED] as the victim of the defendant violating a restraining order she has against him, and ultimately a burglary before March 2, 2012. All these cases are currently open.

On March 2, 2012 Detective [REDACTED] interviewed inmate [REDACTED] [REDACTED] stated that he is currently housed in the special needs dorm of the County Correctional South Facility with the

defendant. [REDACTED] stated that the defendant noticeable shakes from [REDACTED] [REDACTED] stated that the defendant constantly talks about getting revenge on [REDACTED] for ending their [REDACTED]-year relationship. [REDACTED] stated that the defendant told him he lived with [REDACTED] at [REDACTED] in Milwaukee. [REDACTED] stated that the defendant was jealous of the relationship he thinks [REDACTED] has [REDACTED] and was upset because [REDACTED] put him out. [REDACTED] stated that the defendant said his driver's licenses list [REDACTED] so when he gets out he will have a locksmith let him in so he can kill [REDACTED] but was concerned because the house was alarmed. [REDACTED] also stated that the defendant talked about abducting [REDACTED] from her floor office building and killing her.

Detective [REDACTED] stated that [REDACTED] agreed to act as a middleman to get the defendant on the phone to get the defendant's crime recorded. [REDACTED] stated that the defendant is smart and would not want to be recorded on the phone. Because of this Detective [REDACTED] came up with a code in which the defendant would say, "putting the dogs down" instead of killing.

On March 5, 2012 Detective [REDACTED] had a follow up conversation with [REDACTED], in which [REDACTED] told Detective [REDACTED] that he had passed the code along to the defendant. [REDACTED] told Detective [REDACTED] that at this point the defendant only wants [REDACTED] Killed because the defendant wants to kill [REDACTED] when he gets out. [REDACTED] stated that the defendant is reluctant to discuss the details over the phone, but wants [REDACTED] throat slit and wants it done prior to March 20, 2012 because that is when Lipski thinks he is getting out. Detective [REDACTED] then suggested that the defendant tell him the address backwards so the defendant will think they won't be detected.

On March 5, 2012 Detective [REDACTED] while acting in an undercover capacity as [REDACTED] received a collect call from [REDACTED], who is referred to in the calls as "[REDACTED]" At this point in the conversation [REDACTED] put the defendant on the phone. Detective [REDACTED] asked the defendant "that he heard you wanted to put down two bitches, a male and a female." The defendant responded by saying he did not want the female put down, only the male. The defendant said he was willing to pay \$500.00 for this. The defendant then told Detective [REDACTED] acting as [REDACTED] that he was getting out on the 20<sup>th</sup> of March and would pay him them. At this point the defendant gave the phone back to [REDACTED] who told Detective [REDACTED] the defendant needed to write the address down backwards for him and would call back.

A few minutes later [REDACTED] called Detective [REDACTED] back and provided Detective [REDACTED] with the address of [REDACTED] as [REDACTED] in reverse, and the name of [REDACTED] and at this point gave phone to the defendant. That conversation is contained below:

(Q1 = Defendant)

(A = Detective [REDACTED] AKA [REDACTED])

Q1: Hello?

A: Hey, man. So uh, you know, you can't give me shit, man, right now? 'Cause I - you know, I'm - I need to get high and shit. I'm sick and shit. You know, this heroin's fucking with me and shit (unintelligible).

Q1: Yeah. I - yeah, but I - I'm in here though. You know?

A: You ain't got nobody on the outside to give me a dollar or something, you know?

Q1: No. No. Oh, no.

A: No? How do I know I can trust you, man? 'Cause I really don't fuck around no white motherfuckers. You know, I don't know - are you the police?

Q1: No. No. No. No. You - no. You - you have to ask (REDACTED) on - on that one. He know - he uh, trust me.

A: Yeah. Yeah. That - you know, (REDACTED) my family and shit. Yeah. He trust you you know, but I don't know you motherfucker, you know?

Q1: Well he does.

A: All right. How do you want this done, man?

Q1: Uh...

A: Want the motherfucker to walk after that?

Q1: No. No. I (unintelligible) uh, well you know, the dog has to be dead. I think the easiest way probably would be to slit his throat.

A: I can't hear you, my man.

Q1: I uh, think the easiest way to kill the dog would be to slit his throat.

A: All right. That's cool. That's cool. What do you need, man? When do you say you want this done, man?

Q1: As - as soon as possible.

A: And when do I get my money, man?

Q1: You - you just - as soon as I'm out of here. He - he's...

A: When - when are you...

Q1: Probably me and (unintelligible) are gonna do a few things also.

A: You and who?

Q1: (Unintelligible).

A: You know my family?

Q1: (Unintelligible) are gonna do something also.

A: All right, man. All right. Hey um, I got this stolen piece, man. You said you uh, wanted it for you know, when you put the girl down.

Q1: Oh, yeah.

A: Glock - I got it. I'll give it to you for like three.

Q1: Mm-hm. Great.

A: All right.

Q1: All righty. I'll be (unintelligible). Bye-bye. Hello?

A: Yeah?

Q1: Uh, do you wanna speak to [REDACTED] again?

A: Say that again, man. Take your time and shit.

Q1: Did you wanna speak with [REDACTED]?

A: Yeah. No, man. I hope I got this motherfucker - this - the street and shit right, man, 'cause this shit's all fucked up.

Q1: Well...

A: You said on [REDACTED]? Is that what the fuck that is?

Q1: Uh-huh.

A: And then, man, how do you expect me to do this [REDACTED] though? Man, with it you know, if I ring the doorbell...

Q1: Mm-hm.

A: ...that motherfucker he - he don't carry a gun?

Q1: Oh, no. No. No. He just a kid.

A: You want it to the neck?

Q1: Oh, yeah. And...

A: You want that motherfucker - you want that motherfucker - you want that bitch to walk after that, right?

Q1: Oh, no. I don't want him to - I don't want him to breathe after that.

A: What about - what if this bitch is there though, man?

Q1: Uh, no. She - she isn't there between 8:00 and 4 o'clock.

A: You sure she ain't gonna be there 'cause I don't want no more witnesses?

Q1: No. No. No. She - she - she's only home on Saturday and Sunday.

A: Man, I'm - I'm trying to make some money, man. Is that all you want done?

Q1: That - yeah. That's it for right n- now. And I'm gonna try to get it out I might have some others.

A: Hey, man. This is the deal though since I'm waiting on, man. This is gonna cost you a little bit extra though once I hook up with you.

Q1: That's all ight...

A: Are you cool with that?

Q1: Oh, yeah.

A: All right. So you know it's gonna cost you extra plus you want that piece you know? (Unintelligible).

Q1: I - I - I...

A: I'm trying to make some motherfucking money, here.

Q1: All - all right.

A: You know, I'd like to get something in my pocket though right now. You know?

Q1: Yeah. I - I don't - I'm in here. So I - I don't have it.

A: You ain't got no brother, no sister, no - can't you know, can't nobody send me no...

Q1: Huh?

A: Can't hook up with nobody to give me no cash and shit?

Q1: Uh, no. Not - they - they - they might - I...

A: They what?

Q1: Yeah. They're all in my bank at M&I.

A: All right. But you sure this motherfucker, man, when I confront him he ain't gonna have no motherfucking gun?

Q1: Oh, no. Oh, no. No. No. Yeah. He's just a - he's a k- k- k- kid.

A: All right then, man. All right. You know, you got my number, right?

Q1: Uh-huh.

A: You know, so you know, we'll you know, you can give me a call and shit when you get ready and shit. You know?

Q1: Right. I - I - I'm at (unintelligible) done before the t- you know, before I'm out of here.

A: Say that again.

Q1: I said I w- want it done before I'm out of here.

A: Motherfucker, you gotta take your time, man. I can't hear, like, you gotta calm down and shit.

Q1: Yes. I am. I want it over before I'm out of here.

A: Okay. All right. And you said before the 20th, right?

Q1: Yes.

A: All right. You sure you gonna get out, man? 'Cause I'm gonna have this shit on my motherfucking hands if you don't get the fuck out

((Crosstalk))

A: Huh?

Q1: Yeah. Yeah. I'll be out.

A: Say what? You'll be out?

Q1: I - yes.

A: 'Cause I'm gonna be fucked up though, man, if - if I don't get my motherfucking money and you still in there.

Q1: No. No. No. No. I'm not uh, (unintelligible).

A: How you know you gonna get out, man? How you know them motherfucker's gonna let you out?

Q1: Why? Because I have - I have I- I have cancer.

A: You got cancer?

Q1: Yep. And they gotta let me out for treatment.

A: All right, man, 'cause I'm gonna want my motherfucking money though, man.

Q1: Oh, yeah.

A: Don't - don't tell ( ) shit, man, 'cause he wanna - he wanna bail out of this, man. And I ain't giving him shit.

Q1: Oh, no. I will (agree). I'll - I'll - I'll handle him.

A: All right.

Q1: All right?

A: All right, man.

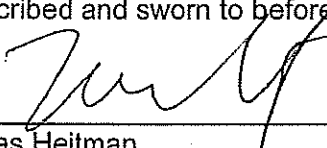
Q1: All - all righty.

A: Later.

Q1: Yeah. Bye.

\*\*\*\*End of Complaint\*\*\*\*

Subscribed and sworn to before me and approved for filing this Day day of Month, Year.

  
\_\_\_\_\_  
Nicolas Heitman  
Assistant District Attorney  
1070560

  
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Complaining Witness